



U.S. Department of Justice

*United States Attorney
Eastern District of Missouri*

Violent Crime Unit

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June 9, 2014

**VIA ELECTRONIC SERVICE &
E-MAIL**

Mr. Jeffrey Goldfarb
Attorney for Defendant Jerry Carter
222 South Meramec, Third Floor
Clayton, Missouri 63105

In re: **Old Chief Stipulation**
United States v. Jerry Carter
Cause No. 4:13CR334 JAR

Dear Counsel:

In anticipation of the upcoming trial on June 23, 2014, and in an effort to conserve time and resources, enclosed please find a proposed stipulation of facts to which your client Jerry Carter and the United States of America may agree. The enclosed stipulation specifically addresses Mr. Carter's status as a previously convicted felon. It also addresses the concerns expressed by the United States Supreme Court in *Old Chief v. United States*, 519 U.S. 172 (1997).

I would appreciate a response to the enclosed stipulation by no later than the close of business on Friday, June 13, 2014.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

RICHARD G. CALLAHAN
United States Attorney

/s/ Sayler A. Fleming
BY: SAYLER A. FLEMING
Assistant United States Attorney

Encls.

cc: Clerk, United States District Court (w/o encls.)